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MEMO ENDORSED

December 14, 2022

VIA ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Defendant Milton's request to file an oversized memorandum of law in support of his post-trial motion pursuant to Rules 29 and 33 of the Federal Rules of Criminal Procedure is granted. The Government is directed to respond by Monday, January 16, 2023. SO ORDERED.

Edgardo Ramos, U.S.D.J.
Dated: December 15, 2022
New York, New York

Re: *United States v. Trevor Milton, 21-cr-478 (ER)*

Dear Judge Ramos,

Defendant Trevor Milton writes to respectfully request permission to file an oversized Memorandum of Law in support of his post-trial motion pursuant to Rules 29 and 33 of the Federal Rules of Criminal Procedure. Mr. Milton requests permission to file a brief that is up to 42 pages long. The government has no objection to this request.

The post-trial motion addresses some of the complex factual and legal questions raised during Mr. Milton's more than two-week long trial (which resulted in a trial transcript of over 3,000 pages), and also presents legal arguments based on juror conduct that either first occurred or first came to light after the verdict was returned. Accordingly, the additional pages requested are necessary for Mr. Milton to present these new facts to the Court and fully brief each of the issues.

Mr. Milton also requests, pursuant to Rule 2(d) of your Honor's Individual Practices, that oral argument be heard on the motion.

Respectfully submitted,

/s/ Alexandra A.E. Shapiro

Alexandra A.E. Shapiro

cc: counsel of record (by ECF)